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8 *Attorneys for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JOHN DOE, as the father of JANE DOE, his  
13 minor daughter; JANET DOE, as the mother  
of JANE DOE, her minor daughter; and JANE  
DOE, individually;

14 Plaintiffs,

15 vs.

16 EQUIPO ACADEMY; JOHN DOES I-X,  
17 inclusive; and ROE CORPORATIONS I-X,  
18 inclusive;

19 Defendants.

Case No.: 2:20-cv-01490-KJD-DJA

**STIPULATED SUPPLEMENTAL ORDER  
TO COURT ORDER (ECF No. 26)**

**(FIRST REQUEST)**

20 Defendant, Equipo Academy, by and through its attorneys of record, James Olson, Esq.  
21 and Stephanie Zinna, Esq., of the law offices of Olson Cannon Gormley & Stoberski, and  
22 Plaintiffs Jane Doe, Janet Doe and John Doe, by and through their attorneys, Douglas Cohen,  
23 Esq. and Wolf, Rifkin, Shapiro, Schulman and Rabkin, LLP, hereby stipulate and agree to the  
24 following supplemental order to the Court's Order (ECF No. 26) as follows:

- 25 1) Sensitive sexually oriented text messages exist by and between Jane Doe and Student X  
26 written at a time when Jane Doe was 12-years-old and Student X was 18-years old;

- 2) Plaintiffs will produce these text messages to Stephanie Zinna marked confidential and for Stephanie Zinna's eyes only on the condition that that texts will not be copied by her in any manner, including electronically, or be used by her in this litigation, or produced to any other person unless there is: (A) a written agreement between the parties or (B) Equipo Academy obtains a Court order permitting any portion of the texts to be copied, supplied to any other person (including an expert) or to be used for this litigation or for any purpose; and
- 3) In addition to the foregoing, the text messages may not be provided to any defense expert unless and until the defense expert signs the agreement attached hereto as **exhibit "A."**

DATED this 7<sup>th</sup> day of June, 2021.

DATED this 7<sup>th</sup> day of June, 2021.

**WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP**

**OLSON, CANNON, GORMLEY &  
STOBERSKI**

By: /s/ Douglas Cohen

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By: /s/ Stephanie Zinna

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*Attorneys for Defendant, EQUIPO  
ACADEMY*

**IT IS SO ORDERED.**

Dated: June 8th, 2021.

  
\_\_\_\_\_  
DANIEL ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of June, 2021, a true and correct copy of **STIPULATED SUPPLEMENTAL ORDER TO COURT ORDER (ECF No. 26) (FIRST REQUEST)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Jennifer Finley  
Jennifer Finley, an Employee of  
WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP

**EXHIBIT A**  
**(ACKNOWLEDGEMENT AND AGREEMENT**  
**TO BE BOUND)**

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**EXHIBIT A**

**ACKNOWLEDGEMENT AND AGREEMENT TO BE BOUND**

I hereby attest to my understanding that ANY TEXT MESSAGES BY AND BETWEEN Jane Doe and Student X designated as “CONFIDENTIAL – Subject to Court Order” AND FOR STEPANIE ZINNA’S EYE’S ONLY are provided to me subject to the STIPULATED SUPPLEMENT TO COURT ORDER ECF No. 26, in *Doe v. Equipo Academy*, Case No. 2:20-cv-01490-KJD-DJA, pending in the United States District Court, District of Nevada. I further attest that I have been given a copy of and have read the STIPULATED SUPPLEMENT TO COURT ORDER ECF No. 26 and that I agree to be bound by its terms. I also understand that my execution of this Acknowledgement and Agreement to Be Bound is a prerequisite to my review of any Materials designated as “CONFIDENTIAL – Subject to Court Order” AND FOR STEPHANIE ZINNA’S EYE’S ONLY.

I further agree that I shall not disclose to anyone except in accord with the SUPPLEMENT TO COURT ORDER ECF No. 26 in *Doe v. Equipo Academy*, Case No. 2:20-cv-01490-KJD-DJA. I further agree and attest to my understanding that my obligation to honor the confidentiality of such Materials and information will continue even after this litigation concludes.

The confidential text messages by and between Jane Doer and Student X will not be copied by me in any manner, including electronically, or be used in this litigation, or be shared with any other person unless there is: (A) a written agreement between the parties or (B) Equipo Academy obtains a Court order permitting any portion of the text messages to be copied, supplied to any other person (including an expert) or to be used for this litigation or for any other purpose. I further agree and attest to my understand that, if I fail to abide by the terms of the Protective Order, I may be subject to sanction, including contempt of court, for such failure.

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1 I agree to be subject to the jurisdiction of the United States District Court, District of  
2 Nevada, for the purposes of any proceedings relating to the enforcement of the Protective  
3 Order.

4 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

6 \_\_\_\_\_  
7 Name:

8 **SUBSCRIBED AND SWORN** to before me  
9 This \_\_\_\_\_ day of \_\_\_\_\_, 2021.

10 \_\_\_\_\_  
11 **NOTARY PUBLIC** in and for the  
12 County of \_\_\_\_\_, State of \_\_\_\_\_.